REMARKS/ARGUMENTS

In response to the Examiner's first Office Action of April 7, 2004 the Applicant submits the accompanying Amendment to the specification, claims and drawings, with markings to show changes made, and the below Remarks directed thereto.

In the Amendment:

Figure 2 is amended to delete the reference numeral 23;

Figure 4 is amended to delete the reference numeral 14;

Page 1 of the specification is amended at line 1 to insert --, now U.S. Patent No. 6,672,707.--, after "May 6, 2002" as suggested by the Examiner;

Page 4 of the specification is amended at line 4 to replace "metal chassis (1)" with --metal chassis (3)--, as suggested by the Examiner;

Claims 1, 3-6 and 8 are amended to overcome the Examiner's objections thereto;

Claim 1 is further amended to clarify that the recited adjustment mechanism of each module engagement plate is adapted to effect minute adjustments of the position of the corresponding printhead module with respect to the support frame at the time the printhead module(s) is engaged with the corresponding module engagement plate via the recited engagement means; and

Claim 9 is amended to conform with amended claim 1.

It is respectfully submitted that the above amendments do not add new matter to the present application.

It is respectfully submitted that the above-described amendment to the drawings to remove reference numerals 23 and 14 from Figures 2 and 4, overcome the Examiner's objections to the drawings.

With respect to the non-statutory double patenting rejection of claims 1 and 5, the Applicant respectfully disagrees with the Examiner's contention that these pending claims are rendered obvious by claims 1 and 7 of USP 6,672,707 in view of Thiel et al. (USP 5,646,658) for at least the following reasons.

Pending claim 1 recites that an adjustable module engagement plate(s) is provided on which the printhead modules are engaged to the support frame and through which ink is supplied to the printhead modules from an ink communication channel(s) of an ink reservoir moulding. As such, in the claimed invention the means for providing minute adjustment of the position of the printhead modules (i.e., the engagement plate and associated adjustment mechanism) also provides an interface between the printhead modules and the ink supply.

Such features of pending claim 1 are not taught or suggested by a combination of the '707 patent and Thiel, since the claims of the '707 patent make no mention of an ink reservoir moulding nor ink communication channel(s) which provide ink to the printhead modules through the module engagement plate, as admitted by the Examiner, and Thiel does not make-up for this deficiency in the '707 patent, contrary to the Examiner contention since in Thiel, the damping blocks 5 provide the corresponding interface to an ink supply which is not the suction spaces 15 as the Examiner contends. This is because, the suction spaces are provided within the head modules 1 and therefore cannot correspond to the recited reservoir

moulding connected to the modules through the ink communication channels and engagement plates.

Thus, in Thiel it is clear that the module engagement plate and the means for adjustment, e.g., the adjustment screw 28 and spacers 41,42 as contended by the Examiner, do not provide an interface between the head modules 1 themselves and an ink supply. Therefore, any combination of the '707 patent and Thiel does not render claims 1 and 5 of the present application obvious.

With respect to the 35 U.S.C. 102(b) and 103(a) rejections of claims 1 to 9, the Applicant respectfully disagrees with the Examiner's contention that these pending claims are variously anticipated by Thiel or rendered obvious by Thiel in view of Sellen et al. (USP 4,338,610), Chan et al. (USP 5,016,023) or Sugitani et al. (USP 4,611,219) for at least the following reasons.

Regarding Thiel, the above arguments apply with respect to the recited reservoir moulding, the ink communication channels and their connection to the printhead modules via the engagement plates as recited in the pending claims. Further, in Thiel the adjustment screws 28 merely perform clamping of the head modules 1 together via the spacers 19,20 and do not provide minute adjustment of the head modules 1 when they are mounted to the base plate 36. That is, the adjustment screws 28 are used in Thiel to initially clamp the spacers 19,20 of the head modules 1 together and then the head modules 1 are secured to (i.e., engaged with) the base plate 36 via the fastening elements 23-26 and the spacers 41,42, which is clearly not the case in the present invention.

However, in order to remove any doubt as to the clear differences between the pending claims and the disclosure of Thiel, claim 1 has been amended to clarify that the printhead modules are already engaged on the corresponding module engagement plates by the engagement means when the minute adjustment is being performed by the adjustment mechanism. This clearly distinguishes the claimed invention from Thiel, since in Thiel the head modules 1 must be positioned with the adjustment screws 28 prior to being secured to the base plate 36 by the fastening elements 23-26, in order for these elements to perform their function correctly.

Neither Sellen, Chan nor Sugitani make-up for the above-noted deficiencies in Thiel, and therefore the amended claims are also distinguished from any combination of these cited references.

It is respectfully submitted that all of the Examiner's objections and rejections have been traversed. Accordingly, it is submitted that the present application is in condition for allowance and reconsideration of the present application is respectfully requested.

Very respectfully,

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